

**Commonwealth of Kentucky**  
**Division for Air Quality**  
**PERMIT STATEMENT OF BASIS**

Title V draft permit, No. V-97-013

**MUNICIPAL POWER & LIGHT**

Henderson, Kentucky 42420

May 11, 2000

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**SOURCE DESCRIPTION, CONTROL EQUIPMENTS & CONSTRUCTION DATE:**

- E. Unit 01: Spreader stoker, coal-fired unit equipped with mechanical collectors constructed on or before 1955.
- E. Unit 02: Spreader stoker with fly-ash reinjection, coal-fired unit equipped with mechanical collectors and electrostatic precipitator constructed on or before 1968.
- E. Unit 03: Diesel Generator - Number two fuel-oil fired unit constructed on or before 1949.
- E. Unit 04: Diesel Generator - Number two fuel-oil fired unit constructed on or before 1949.
- E. Unit 05: Coal Conveying and Handling includes receiving hopper, conveyors, coal crusher, and stockpile constructed on or before 1968.

**REGULATION APPLICABILITY:**

All the applicable regulations to the emission units are listed in the permit. The following regulations are not applicable based on size of emission unit or applicability date of regulation.

Regulations not applicable to Unit 1 and 2 due to applicability date or size of unit:

Regulation 401 KAR 59:015, New indirect heat exchangers, incorporating by reference 40 CFR 60, Subpart D, Standards of performance for fossil-fuel-fired steam generators applicable to an emission unit with a capacity of more than 250 mmBTU per hour and commenced on or after August 17, 1971.

Regulation 401 KAR 59:016, New electric utility steam generating units incorporating by reference 40 CFR 60, Subpart Da, Standards of performance for electric utility steam generating units applicable to an emission unit with a capacity of more than 250 mmBTU per hour and commenced on or after September 19, 1978.

Regulation 401 KAR 60:042, Standards of performance for industrial-commercial-institutional steam generating units incorporating by reference 40 CFR 60, Subpart Db.

Regulation not applicable to Unit 5 (Coal Handling) due to definition of affected facility:

Regulation 401 KAR 60:250, Standards of performance for coal preparation plants adopting by reference 40 CFR Subpart Y.

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COMMENTS:

- The permittee has not proposed any alternate operating scenario for any of the emissions units.
- This permit does not impose any emission cap on any of the emissions units.
- This source is subject to acid rain requirements and the Division has issued a Phase II acid rain permit for this facility; Permit Number: AR-96-16.
- The permittee will be required to conduct at least two particulate performance test for each emissions units 1 and 2 to demonstrate compliance with allowable standards within the term of this permit. The permittee may assure continuing compliance with particulate standard using opacity data as an indicator as described in the permit. Additional stack tests for particulate may be required under the circumstances described in the permit.
- The permittee assure compliance with sulfur dioxide emission standard for emissions unit 1 by calculating the emission as described in the permit using emission factor and heating value of the coal.
- The permittee may assure compliance with opacity standard for emissions unit 1 by reading the opacity of emissions by EPA Reference Method 9, weather permitting, once every daylight shift while the indirect heat exchanger is in operation.
- The permittee may assure compliance with sulfur dioxide and opacity standards for emissions unit 2 using CEM and COM data respectively.
- Emissions unit 3 and 4 are not subject to any applicable regulations.
- Emissions unit 5 coal handling operations are subject to Regulation 401 KAR 63:010, Fugitive emissions and are considered to be in compliance when using control measures required by 63:010.
- The permittee shall submit a compliance assurance monitoring (CAM) plan for emissions units 1 and 2 with an application for significant revision of those emissions units or with the application for Title V permit renewal.